

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company of which the party owns ten percent or more of the outstanding shares.

RESPONSE

Plaintiff is not a publicly owned company.

D. State the basis for asserting your claim in the division in which it is filed.

RESPONSE

A substantial part of the events or omissions giving rise to the claims alleged in this suit occurred within the County of Spartanburg, South Carolina.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reasons would entail substantial duplication of labor if heard by different judges.

RESPONSE

This action is not related in whole or part to any other matter filed in this District.

DATED this the 11th day of June, 2013.

Respectfully submitted,

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